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[Counsel Continued on Next Page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

GUARDANT HEALTH, INC., a Delaware
corporation,

Plaintiff,

vs.

NATERA, INC., a Delaware corporation;
CATALIN BARBACIORU, an individual;
and DOES 1 through 50, inclusive,

Defendants.

Case No. 3:25-cv-01837

**JOINT STIPULATION UNDER L.R. 6-1(b)
EXTENDING DEFENDANTS' TIME TO
RESPOND TO COMPLAINT AND CASE
MANAGEMENT DEADLINES**

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JOINT STIPULATION

Pursuant to Local Rule 6-1(b), Plaintiff Guardant Health, Inc. (“Plaintiff”) and Defendants Natera, Inc. and Catalin Barbacioru (“Defendants” and, collectively with Plaintiff, the “Parties”), by and through their attorneys of record, enter this Joint Stipulation, subject to the approval of the Court, based on the following facts and circumstances:

WHEREAS, on February 20, 2025, Plaintiff filed its Complaint in this matter;

WHEREAS, on February 21, 2025, the Court entered an order setting initial case management conference and ADR deadlines (“Initial Case Management Order”) (Dkt. No. 6);

WHEREAS, on February 25, 2025, Plaintiff served the summons and Complaint on Defendants;

WHEREAS, on March 11, 2025, the Parties filed a Joint Stipulation Extending Defendants’ Time to Respond to Complaint, extending Defendants’ deadline to respond to the Complaint to April 17, 2025 (Dkt. No. 20);

WHEREAS, on April 11, 2025, the Parties filed a Joint Stipulation Extending Defendants’ Time to Respond to Complaint, extending Defendants’ deadline to respond to the Complaint to May 19, 2025 (Dkt. No. 21);

WHEREAS, on May 6, 2025, the Parties filed a Joint Stipulation Extending Defendants’ Time to Respond to Complaint and Case Management Deadlines, extending Defendants’ deadline to respond to the Complaint to July 21, 2025 and extending case management deadlines until after Defendants respond to the Complaint;

WHEREAS, the Parties completed execution of a protocol pursuant to a Confidential Agreement Regarding Forensic Analysis dated April 16, 2025 (“Forensic Protocol”);

WHEREAS, Defendants each intend to file a motion to dismiss the claims alleged against them if the case against them is not dismissed by their deadline to file their motion to dismiss;

WHEREAS, the Parties are now discussing next steps following completion of the Forensic Protocol and believe that these discussions may aid in narrowing or resolution of the case;

WHEREAS, to provide time to appropriately consider potential resolution or further

1 narrowing to this case, the Parties have agreed to extend the deadline by which Defendants must
 2 file their motions to dismiss by another two weeks;

3 **WHEREAS**, under this Joint Stipulation, Defendants' new deadline to respond to the
 4 Complaint will be August 4, 2025; and

5 **WHEREAS**, for the same reasons the Parties request an extension to the response
 6 deadline, the Parties also request that the Court extend initial case management conference and
 7 ADR deadlines provided in the Initial Case Management Order until after Defendants have
 8 responded to the Complaint.

9 **NOW, THEREFORE**, pursuant to Local Rule 6-1(b), the Parties stipulate and agree
 10 through their counsel of record, subject to approval of the Court, that the time within which
 11 Defendants may answer, object to, or otherwise respond to Plaintiff's Complaint is extended up
 12 through and including August 4, 2025.

13 The Parties agree that the deadlines in the Initial Case Management Order are extended as
 14 set forth in the table below:

| Case Management Event | Current Deadline | Proposed Deadline |
|---|------------------------|---|
| Deadline to file ADR Certification. (See ADR L.R. 3) | 7/29/2025 | 8/12/2025 |
| Deadline to meet and confer re: initial disclosures, early settlement, ADR process selection, and discovery plan. (See F.R. Civ. P. 26(f)) | 7/29/2025 | 8/12/2025 |
| Deadline to make initial disclosures. (See F.R. Civ. P. 26(a)(1)) | 8/12/2025 | 8/26/2025 |
| Deadline to file Joint Case Management Statement. | 8/12/2025 | 8/26/2025 |
| Initial Case Management Conference (To be held by Zoom) | 8/19/2025 at 1:30 p.m. | 9/2/2025 at 1:30 p.m. via Zoom (Subject to Court's Availability) |

1 Dated: July 14, 2025

O'MELVENY & MYERS LLP

2
3 By: /s/ David S. Almeling

4 David S. Almeling

Attorneys for Defendants

5 Dated: July 14, 2025

KELLER ANDERLE SCOLNICK LLP

6
7 By: /s/ Chase Scolnick

8 Chase Scolnick

Attorneys for Plaintiff

ATTESTATION

I hereby attest that the other signatory listed, on whose behalf this filing is submitted,
concurs in the filing's content and has authorized the filing.

Dated: July 14, 2025

By: /s/ David S. Almeling
David S. Almeling

[PROPOSED] ORDER

Upon consideration of the Joint Stipulation Under L-R 6-1(b) Extending Defendants' Time to Respond to Complaint and Case Management Deadlines, **IT IS HEREBY ORDERED** that:

1. The time within which Defendants may answer, object to, or otherwise respond to Plaintiff's Complaint is extended up through and including August 4, 2025.
2. The case management deadlines set in the Order Granting Stipulation Extending Defendants' Time to Respond to Complaint and Modify Case Management Deadlines (Dkt. No. 24) are extended as set forth in the table below:

| Case Management Event | Current Deadline | Proposed Deadline |
|---|------------------------|---|
| Deadline to file ADR Certification. (See ADR L.R. 3) | 7/29/2025 | 8/12/2025 |
| Deadline to meet and confer re: initial disclosures, early settlement, ADR process selection, and discovery plan. (See F.R. Civ. P. 26(f)) | 7/29/2025 | 8/12/2025 |
| Deadline to make initial disclosures. (See F.R. Civ. P. 26(a)(1)) | 8/12/2025 | 8/26/2025 |
| Deadline to file Joint Case Management Statement. | 8/12/2025 | 8/26/2025 |
| Initial Case Management Conference (To be held by Zoom) | 8/19/2025 at 1:30 p.m. | 9/2/2025 at 1:30 p.m. via Zoom (Subject to Court's Availability) |

DATED: July __, 2025

The Honorable Edward M. Chen
United States District Judge